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June 21, 2023

Honorable Margo K. Brodie
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

BY ECF

Re: United States v. Michael Hlday
20 Cr. 008 (MKB)

Dear Judge Brodie:

Defendant Michael Hlday (“Hlday”) is currently at liberty on a bond that contains numerous conditions including electronic monitoring. On June 23, 2023, Hlday is scheduled to undergo another brain scan that requires removal of his location monitoring bracelet. Pretrial Services (“Pretrial”) will, upon receiving permission from the Court, have the supervising district remove Hlday’s bracelet just prior to the procedure and replace it shortly after the procedure is complete. Accordingly, defendant respectfully requests that the Court permit removal of the bracelet on May 23, 2023 as directed by Pretrial. The government, by Assistant United States Attorney Jonathan Lax, and Pretrial, by United States Pretrial Officer, Valeria Lopez, consent to this application.

Thank you for Your Honor’s consideration of this request.

Very truly yours,
Sanford Talkin
Sanford Talkin

cc: AUSA Jonathan Lax (by ECF)
USPTO Valeria Lopez (by email)
USPTO Garry Hackett (by email)